



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

March 1, 2021

Brian Connors
Operations Lead, East
Chevron Environmental Management Company
1200 State Street
Perth Amboy, New Jersey 08861

Re: Justification for CA550 Final Notice Determination
Former Chevron Perth Amboy Facility
Perth Amboy, Middlesex County, New Jersey
EPA ID #: NJD081982902

Dear Mr. Connors:

The U.S. Environmental Protection Agency (EPA) Region 2 and the New Jersey Department of Environmental Protection (NJDEP) have completed our review of the Justification for CA550 Final Notice Determination, submitted for the Former Chevron Perth Amboy Facility, in Perth Amboy, Middlesex County, New Jersey. The workplan was submitted by Chevron Environmental Management Company pursuant to the Resource Conservation and Recovery Act (RCRA), Hazardous and Solid Waste Amendments (HSWA) Permit of 2013, and the NJDEP Technical Requirements for Site Remediation, N.J.A.C.7:26E. We have the following comments:

Specific Comments:

1. In the cover letter, Chevron states that "This letter serves to document that site-wide remedial construction complete has been completed in accordance with the HSWA Permit Renewal at the Former Chevron Perth Amboy Facility (Facility) in Perth Amboy, NJ." This is not accurate as there is no remedy selection for the waterbodies. Based on previous conversations with Chevron, we have agreed on a partial CA550 determination limited to the on-site SWMU's and AOC's. The waterbodies will be addressed under a separate mechanism.
2. AOC 3: Please confirm that the exceedances of BaP are below 10 ppm to verify the appropriateness of a deed notice as an acceptable institutional control.
3. AOC 6A, 6B, 6C: The HSWA Permit includes further evaluation of groundwater as a corrective measure for AOC 6A, 6B, and 6C. This was omitted from the notice. Please confirm that the groundwater evaluation was complete.
4. AOC 7: While the HSWA Permit documents that no exceedances were demonstrated, it still requires further evaluation of soil and groundwater. Please confirm that an evaluation of soil and groundwater was performed and the results of such evaluation.
5. AOC 13: Please confirm that Chevron conducted an evaluation of groundwater.

6. AOC 16B: Please confirm if ISCO treatment for benzene concentrations in groundwater was conducted.
7. AOC 25: Please confirm if ISCO or enhanced bioremediation for benzene concentrations in groundwater was conducted.
8. AOC 37: EPA and NJDEP have determined that no further investigation of lead is required, and all required corrective measures for benzene have been implemented. This determination will need to be included in the CA550 notice. We will need to determine how to remove ISS for lead in soil from the permit, given that lead is not a contaminant of concern.
9. SWMU 8: Chevron claims that it submitted a NFA request for LNAPL in SWMU 8 with the Q2 2017 Quarterly Progress Report. Upon review, there is no justification for NFA. Please elaborate on this further.

Should you have any questions or would like to discuss this matter further, I can be reached at 212-637-3703, or via email at vargas.ricardito@epa.gov.

Sincerely,

A handwritten signature in black ink that reads "Ricardito Vargas". The signature is fluid and cursive, with the first name "Ricardito" and last name "Vargas" clearly distinguishable.

Ricardito Vargas
Project Manager
Land and Redevelopment Programs Branch

cc: Charles Zielinski, NJDEP (electronic copy only)